

STATEMENT OF BASIS
GE (Greenville) Gas Turbines, LLC
Greenville, Greenville County, South Carolina
SCD 049 126 097

PURPOSE OF THE STATEMENT OF BASIS

This Statement of Basis has been prepared to inform the public and provide an opportunity to comment on a proposed remedies at GE (Greenville) Gas Turbines, LLC in Greenville, SC. GE (Greenville) Gas Turbines, LLC is located at 300 Garlington Road, Greenville, South Carolina 29615.

GE Gas Turbines (GEGT) has a Hazardous Waste Management Permit (SCD 049 126 097) for PostClosure Care of one hazardous waste management unit consisting of three closed former hazardous waste surface impoundments (lagoons). The permit also includes Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) that require cleanup. The 1996 Hazardous Waste Management Permit included a list of previously-identified SWMUs and AOCs. Since 1996, GEGT has identified and notified South Carolina Department of Environmental Services (SCDES, formerly SCDHEC) of several additional SWMUs and AOCs. The majority of the SWMUs and AOCs did not have a release of hazardous waste or hazardous waste constituents to the environment, and No Further Action (NFA) has been approved for these units and areas. Since 2007, additional SWMUs and AOCs were approved for no further action by SCDES in a letter dated September 24, 2009, specifically SWMUs 4A, 4B, 10, and 15 and the main manufacturing building AOCs identified as JGB, MGB/MFB, LEB, AVA, MBB, APA, and BUA.

The January 2010 Corrective Measures Study (CMS) Report evaluated several remedial options for remaining SWMUs and AOCs. Corrective action has been selected for AOC G - Little Rocky Creek, as detailed below. Land-use controls will restrict soil disturbance and groundwater use at this site, as detailed in the SCDES-approved Land Use Control Management Plan (LUCMP)). SCDES also approved the groundwater remedy for the site, which will be the selected remedy for AOC G.

Below is a table listing the SWMUs and AOCs and the specific proposed remedies:

SWMU or AOC Number/Name	Description of Proposed Remedy
SWMU 4A (Sludge Conditioning Tank)	No Further Action at this time
SWMU 4B (Sludge Press)	No Further Action at this time
SWMU 10 (Storm Drains)	No Further Action at this time
SWMU 15 (Service Building)	No Further Action at this time
AOC JGB Workstation	No Further Action at this time
AOC MGB/MFB	No Further Action at this time

SWMU or AOC Number/Name	Description of Proposed Remedy
AOC LEB	No Further Action at this time
AOC AVA	No Further Action at this time
AOC MBB	No Further Action at this time
AOC APA	No Further Action at this time
AOC BUA	No Further Action at this time
AOC G (Little Rocky Creek)	Continued operation of the groundwater extraction system to prevent off-site migration and control discharge of contaminants of concern to Little Rocky Creek.

SCDES has determined that the proposed remedies are protective of human health and the environment. However, prior to final selection, the public has an opportunity to comment. At any time during the public comment period, the public may comment as described in the "How Do You Participate?" section. Upon closure of the public comment period, SCDES will evaluate all comments and questions and determine whether there is a need to modify the proposed remedies.

HOW DO YOU PARTICIPATE?

SCDES solicits public review and comment prior to approval of the proposed remedies for the listed SWMUs and AOCs. The public comment period begins on **November 19, 2024** and continues until **January 8, 2025**.

The Statement of Basis and supporting documents associated with the investigations and proposed remedies are available to the public for review during regular business hours, Monday through Friday, except legal holidays at the following location:

SCDES
 Division of Waste Management
 Bureau of Land and Waste Management
 2600 Bull Street
 Columbia, SC 29201

Any comments on the proposed remedies and/or requests for a public hearing should be sent to:

Stacey French, P.E., Director
 Division of Waste Management
 Bureau of Land and Waste Management
 South Carolina Department of Environmental Services

2600 Bull Street
Columbia, South Carolina 29201
Phone (803) 898-0238
Email stacey.french@sc.des.gov

Written comments or requests for a public meeting must be submitted no later than **January 8, 2025**, at which time the public comment period will end.

FACILITY DESCRIPTION

The GEGT facility is located at 300 Garlington Road in the county of Greenville, South Carolina. The site comprises one parcel of approximately 418 acres located east of the intersection of Interstate Highways 85 and 385. The parcel is bounded to the west and northwest by Garlington Road and light industrial properties, to the north and northeast by residential and light industrial properties, to the south by light industrial and commercial properties along Woodruff Road, and to the east by residential and light industrial commercial properties along Feaster Road. Little Rocky Creek flows from west to east along the property's southern border.

The facility was constructed in 1967 on a previously undeveloped parcel. Approximately half of the property is occupied by manufacturing and support services buildings, utility structures, a recreational area, and parking areas, while the remainder consists of undeveloped wooded areas and fields. The main facility structures include the Main Manufacturing Building, Gas Turbine Technology Center, Materials Distribution Center, Service Building, Recycling Building, Combustion Liner Manufacturing Building, Test Stand Buildings, Gas Turbines Outage Simulator Building, Advanced Manufacturing Works Building, Wastewater Treatment Plant, Electrical Sub-Stations and closed on-site Landfill.

The facility has operated manufacturing processes at the site since 1968. The facility is a fully integrated machining, assembly, repair and testing plant for the manufacture of large industrial gas turbines and associated components and systems. Manufacturing operations occur in the Main Manufacturing Building, Advance Manufacturing Works Building and the Test Stands Buildings. The Recycling Building is used for the storage and reclamation of fluids and scrap metal from the manufacturing operations, and the Service Building is used for the servicing and repair of construction and maintenance equipment used by contract and GEGT personnel.

The facility previously operated an on-site industrial wastewater treatment plant (WWTP) that received wastes that resulted from cleaning activities related to manufacturing. The wastes resulting from this activity consisted of a listed hazardous waste meeting the definition of a hazardous waste (having Environmental Protection Agency waste code F001). This waste was discharged to the on-site industrial wastewater treatment system for treatment. The WWTP treating this waste formerly included three surface impoundments

(Aeration Lagoon, Industrial Lagoon, and Sludge Lagoon). The impoundments were closed in 1993 pursuant to the requirements of R.61-79.265 Subpart G (Closure and PostClosure).

PERMIT HISTORY

GEGT was issued a PostClosure Care (PCC) Permit SCD 049 126 097 on June 3, 1996. GEGT's RCRA PCC Permit includes groundwater monitoring and corrective action for the closed impoundments, and also addresses corrective action requirements for SWMUs and AOCs.

The permit has been renewed and modified periodically as required. The current permit expired on June 24, 2020, but has been administratively extended until the permit renewal process is complete. A permit renewal application was submitted to SCDES on January 29, 2020.

PROPOSED REMEDIES

As noted above, except for AOC G, the other SWMUs and AOCs referenced herein have been determined to require no further action. For AOC G, the proposed remedy is the ongoing pump and treat groundwater remediation system which will prevent groundwater impacts from reaching Little Rocky Creek.

Land-use controls will be implemented as part of the overall Land Use Control Management Plan for the facility. Land-use controls will be imposed to prevent access to the portions of the facility where potential hazards remain, restrict groundwater use, and prohibit disturbances to soils as appropriate at areas of contamination unless given prior approval and oversight by SCDES.

PUBLIC PARTICIPATION

To facilitate public participation in the corrective action process, the following actions have been taken:

- A local information Repository has been established at the SCDES Main Office in Columbia, SC.
- A Public Notice, Fact Sheet, and this Statement of Basis have been developed.
- A mailing list has been prepared for distribution of the Public Notice; and
- The Public Notice, Statement of Basis, Fact Sheet, draft permit, and other documents related to the site have been placed on the public notice page of the SCDES website.

NEXT STEPS

Following consideration of public comments by SCDES, a revised Final Decision and Response to Comments (FDRTC) accepting or rejecting the proposed corrective action will be issued.